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PLEASE SEND MAIL TO 103 EISENHOWER PARKWAY SUITE 400, ROSELAND, NJ 07068 FOR PROCESSING

August 16, 2023

VIA ECF

The Honorable Julian Xavier Neals, U.S.D.J.
United States District Court,
District of New Jersey, Newark Venue
50 Walnut Street, Room 4015
Newark, New Jersey 07101

Re: The Trustees of the Stevens Institute of Technology v. iModalGround, LLC et al.
Docket No.: 2:22-CV-04411-JXN-JBC
Our File No.: STEVENS-001

Dear Judge Neals:

As Your Honor is aware, we represent the Plaintiff, The Trustees of the Stevens Institute of Technology (hereinafter "Plaintiff"), a non-profit educational institution, in the above-referenced action. Please accept this correspondence as Plaintiff's request to extend Your Honor's 60 Day Order Administratively Terminating this action by thirty (30) days. *See generally, E.C.F. Doc. 35.*

On June 30, 2023, the Plaintiff and the Defendants, iModalGround, LLC and Inter-Modal Holdings, LLC (hereinafter "Defendants"), had the opportunity to participate in a Settlement Conference with the Honorable James B. Clark, III, U.S.M.J. The parties were able to reach a settlement in principle subject to an executed settlement agreement. At this time, the parties have exchanged drafts of the proposed settlement agreement and are working to finalize same; however, this action may be terminated prior to the finalization and execution of the settlement agreement.

Currently, pursuant to Your Honor's 60-day Order, this matter is set to administratively terminate by August 29, 2023. *See generally, E.C.F. Doc. 35.* The Plaintiff respectfully requests that Your Honor's Order be extended thirty (30) days up to and including September 28, 2023 so that the parties can finalize their settlement agreement to fully resolve this subject action. This letter is sent with the consent of counsel for the Defendants.

Should Your Honor require any further information, please do not hesitate to contact the undersigned.

Very truly yours,

MATTHEW B. SICHERI

MBS/ao

cc: Jason R. Mischel, Esq. (via ECF and electronic mail)